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UNITED STATES DEPARTMENT OF COMMERCE  
National Telecommunications and  
Information Administration  
Washington, D.C. 20230

MAR 24 2004

Mr. Edmond J. Thomas  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
445 Twelfth Street S.W.  
Washington, DC 20554

ET Doc. 01-278  
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Dear Mr. Thomas,

Federal Communications Commission  
Office of the Secretary

On March 18, 2004, the National Telecommunications and Information Administration (NTIA) sent a letter to the Federal Communications Commission (Commission) addressing issues related to the draft Report and Order (R&O) in ET Docket No. 01-278.<sup>1</sup> In addition to the issues raised in that letter, there are several areas requiring further clarification.

In our letter a protection zone of 40 kilometers (km) around critical Department of Defense (DoD) radar systems was specified.<sup>2</sup> To prevent interference to these DoD radar systems, radio frequency identification (RFID) systems are not permitted to operate within 40 km of the following locations:

| DoD Radar Site              | Latitude     | Longitude     |
|-----------------------------|--------------|---------------|
| Beale Air Force Base        | 39 08' 10" N | 121 21' 04" W |
| Cape Code Air Force Station | 41 45' 07" N | 070 32' 17" W |
| Clear Air Force Station     | 64 55' 16" N | 143 05' 02" W |
| Cavalier Air Force Station  | 48 43' 12" N | 097 54' 00" W |
| Eglin Air Force Base        | 30 43' 12" N | 086 12' 36" W |

To ensure that the RFID systems do not operate within the 40 km protection zones, the operator of the RFID system must register their system with the Commission's Office of Engineering and Technology. The information to be provided by the system operator includes: name, address, and other pertinent contact information of the user, the address and geographic coordinates of the operating location, and the Commission's identification number of the device. The registration information is to be provided to the DoD through NTIA.

1. Letter from Fredrick R. Wentland, Associate Administrator, Office of Spectrum Management, National Telecommunications and Information Administration to Edmond J. Thomas, Chief, Office of Engineering and Technology, Federal Communications (March 18, 2004).

2. *Id.* at 2.

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List A B C D E

The original proposal by the Commission considered RFID system operations in the 425-435 MHz frequency range. As stated in our letter, the loss of any frequency access will impact the flexibility and performance of current and future radar systems.<sup>3</sup> Reducing the available spectrum for RFID systems from 10 MHz as proposed by the Commission to 1 MHz will reduce the impact to the DoD radar systems that employ frequency-hopping or frequency agility techniques. Thus NTIA strongly recommends that RFID systems be limited to the 433.5-434.5 MHz band segment. The reduction in available spectrum should not impact the implementation of RFID systems and will provide the needed flexibility to DoD radar operations.

Respectfully,



Frederick R. Wentland  
Associate Administrator  
Office of Spectrum Management

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3. *Id.*